

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
v.	)	Criminal Action No. 06-21-SLR
	)	
JASON QUARLES,	)	
	)	
Defendant.	)	

**ORDER**

Having considered Defendant's Motion to Waive the Application of the Speedy Trial Act,

**IT IS HEREBY ORDERED** this \_\_\_\_ day of June, 2006, that Defendant's Motion is  
**GRANTED** and the time period from June 13, 2006 to August 11, 2006 is hereby excluded from  
the Speedy Trial Act calculations.

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Chief Judge Sue L. Robinson  
United States District Court

cc: AUSA Beth Moskow-Schnoll  
AFPD Christopher Koyste

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Plaintiff,	)	
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v.	)	Criminal Action No. 06-21-SLR
	)	
JASON QUARLES	)	
	)	
Defendant.	)	

**MOTION TO  
WAIVE THE APPLICATION OF THE SPEEDY TRIAL ACT**

Defendant, Jason Quarles, by and through his undersigned counsel, Christopher S. Koyste, hereby moves the Court to issue an order that excludes June 13, 2006 through August 11, 2006 from the Speedy Trial Act calculations. This additional 60 day time period will allow the Defense additional time to negotiate with the Government and to present additional mitigating facts and information with the Government. Counsel submits the following in support thereof:

1. Mr. Quarles was indicted on September 27, 2005 for 42 counts of uttering a counterfeit security instrument in violation of Title 18 U.S.C. Section 513(a). Mr. Quarles is gainfully employed and currently released on his own recognizance.

2. Mr. Quarles has met with the Government and presented information in order to effect the plea negotiations in this action. Mr. Quarles needs additional time to develop additional facts and information to utilize in the Defense's negotiations with the Government. Such relief from the Speedy Trial Act is not only in Mr. Quarles' interest, but in the public's interest in that additional information is likely to flow to the Government as a result of the additional time period. Thus, the Defense asserts that the requested time exclusion satisfies the interests of justice as is required by the

Supreme Court in Zedner v. United States, 126 S. Ct. 1976 (2006).

3. AUSA Beth Moskow-Schnoll does not oppose Mr. Quarles' request.

WHEREFORE, Mr. Quarles respectfully requests the Court to issue an order that excludes the time period from June 13, 2006 to August 11, 2006 from the Speedy Trial Act calculations.

/s/ Christopher S. Koyste  
CHRISTOPHER S. KOYSTE, ESQUIRE  
Assistant Federal Public Defender  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Jason Quarles

Dated: June 13, 2006

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that this Motion To Waive the Application of the Speedy Trial Act is available for public viewing and downloading and was electronically delivered on June 13, 2006 to:

Beth Moskow-Schnoll, Esq.  
Assistant United States Attorney  
1007 Orange Street, Suite 700  
Wilmington, Delaware 19801

/s/ Christopher S. Koyste  
CHRISTOPHER S. KOYSTE, ESQUIRE  
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Attorney for Jason Quarles